

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ALBERTO RIVERA MONROY and IRMA
PARRA-RIVERA, husband and wife,

Plaintiffs,

v.

REAL TIME RESOLUTIONS INC.,
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., and
MTC FINANCIAL INC. d/b/a TRUSTEE
CORPS.

Defendants.

2:21-cv-00813-BJR

STIPULATED MOTION AND ORDER
TO EXTEND TRIAL AND REMAINING
CASE DEADLINES

REAL TIME RESOLUTIONS INC.,

Counterclaim-Plaintiff,

v.

ALBERTO RIVERA MONROY and IRMA
PARRA-RIVERA, husband and wife,

Counterclaim-Defendants.

I. STIPULATED MOTION

The Plaintiffs, Alberto Rivera Monroy and Irma Parra-Rivera, husband and wife and the marital community composed thereof, collectively (“Plaintiffs / Counterclaim Defendants”), and Real Time Resolutions, Inc. (“RTR”), Mortgage Electronic Registration Systems, Inc.

1 (“MERS”), and MTC Financial Inc., d/b/a Trustee Corps (“MTC”), by and through their
2 undersigned counsel, stipulate as follows:

3 Plaintiffs intend to take the oral, remote deposition of RTR's 30(b)(6) deponent and
4 MERS' 30(b)(6) deponent, and RTR intends to take the oral, remote deposition of Plaintiffs.
5 The parties have met and agreed to extend the trial and case schedule deadlines as set forth
6 herein pursuant to Local Rules (d)(1), 10(g) and 16(b) and hereby file this stipulated motion to
7 request that the court continue the deadlines as set forth herein in the case schedule and for a
8 continuation of the Trial as currently set by the Court's Order Setting Jury Trial and Pretrial
9 Dates (Dkt No. 46).

10 This is the second request for an extension of the case schedule requested by the parties.
11 At this stage in the litigation, the parties are working together in good faith to complete
12 discovery and other matters in the case and believe that there is good cause for an extension of
13 deadlines as requested herein.

14 Specifically, the parties are in the process of narrowing certain outstanding discovery
15 disputes relating to discovery requests which have already been propounded and responded to,
16 which they expect to be completed by August 10, 2022, and after that date, the parties intend to
17 bring any remaining outstanding issues before the court for resolution via a telephone
18 conference and/or discovery motions for resolution. Once these disputes are resolved, the
19 parties will set dates to depose the Rule 30(b)(6) witnesses for RTR, MERS, and Plaintiffs on
20 deposition notices that have already been served. Thus, the continuance of the trial and the
21 below deadlines will allow resolution of the remaining discovery issues in this case and thus
22 the Parties request a 90 (day) extension as detailed herein, with the trial extended out
23 accordingly. For the avoidance of doubt, the Parties do not intend and do not agree that the
24 requested extension will permit any new written discovery requests or notices of deposition.
25 Rather, the Parties intend and agree to allow sufficient time to resolve disputes on those existing
26 discovery requests that have already been propounded, and completion of those depositions that
have already been noticed. The Parties agree they do not waive any rights via this stipulation.

Trial Date	Current Date 2/13/2023	New Date 5/13/2023 or a date convenient for the Court
Completion of Outstanding Depositions and discovery motions regarding Pending Discovery ¹	7/31/2022	10/31/2022
All dispositive Motion must be Completed by	9/14/2022	12/14/2022
All motions in limine must be filed by	1/7/2023	4/7/2023
Joint Pretrial Statement	1/14/2023	4/14/2023
Pretrial Conference	1/30/2023	4/30/2023
Length of Trial	4 days	Jury

STIPULATED this 28th day of July, 2022

¹ The Parties agree that no new written discovery or deposition notices are included in this request, and none will be allowed under this stipulation. “Outstanding Discovery” and “Pending Discovery,” as used in this stipulation and order refer only to the depositions of plaintiffs, to the 30(b)(6) depositions of RTR and MERS, and to the written discovery requests and responses that have already been propounded in this case.

BARRAZA LAW, PLLC

HENRY & DEGRAAFF, PS

/s/ V. Omar Barraza
V. Omar Barraza, WSBA #43589
10728 16th Avenue SW
Seattle, Washington 98146
omar@barrazalaw.com
Tel.: (206) 933-7861
Fax.: (206) 933-7863

/s/ Christina L Henry
Christina L Henry, WSBA #31273
113 Cherry St, PMB 58364
Seattle, Washington 98104
chenry@hdm-legal.com
Tel.: (206) 330-0595
Fax.: +1 (206) 400-7609

PETERSON RUSSELL KELLY,
PLLC

HOLLAND & KNIGHT, LLP

/s/ Michael Steven DeLeo
Michael Steven DeLeo, WSBA 22037
Counsel for Defendant MTC Financial,
Inc., dba Trustee Corps
1850 Skyline Tower
10900 NE 4th St
Bellevue, WA 98004-8341
425-462-4700
Fax 452-451-0714
mdeleo@prklaw.com

/s/ Garrett S. Garfield
Garrett S. Garfield, WSBA# 458375
601 Southwest 2nd Ave #1800
Portland, Oregon 97204
Garrett.Garfield@hklaw.com
John.Joseph@hklaw.com

II. ORDER

The Court having considered the foregoing stipulated motion of the Parties in this case, and finding that good cause has been shown for the requested relief, now therefore, it is hereby

ORDERED as follows:

Trial Date	Current Date 2/13/2023	New Date 5/15/2023 or a date convenient for the Court
Completion of Outstanding Depositions and discovery motions regarding Pending Discovery	7/31/2022	10/31/2022
All dispositive Motion must be Completed by	9/14/2022/	12/14/2022
All motions in limine must be filed by	1/7/2023	4/7/2023
Joint Pretrial Statement	1/14/2023	4/14/2023
Pretrial Conference	1/30/2023	5/3/2023
Length of Trial	4 days	Jury

DONE THIS 2nd day of August, 2022.



The Hon. Barbara J. Rothstein
United States District Court Judge